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May 18, 2022

Via Mail

Judge Pamela K. Chen
Courtroom: 4F
Chambers: N 631
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Revised Motion to Compel Arbitration Research
Carlos Collazos v. Garda CL Atlantic, Inc.; 21-cv-02095-PKC-JRC*

Dear Judge Chen:

The undersigned represents Garda CL Atlantic, Inc. (“Garda”) in its Revised Motion to Compel Arbitration of Individual Claims and Stay Litigation of Class Action Claims. On or about March 11, 2020, Plaintiff Carlos Collazos filed the above-referenced putative class action against Defendant Garda, which Garda removed to the Eastern District of New York on April 16, 2021. Defendant filed a motion for pre motion conference regarding a Motion to Compel Arbitration and Stay the Proceeding Pending Arbitration on September 15, 2021. At the pre motion conference, held on November 10, 2021, this court set a briefing schedule for the motion. The briefing schedule was postponed pending the court’s review of a joint motion regarding the joinder of necessary parties. After resolution of the motion, this court set a renewed briefing schedule for the motion on May 3, 2022.

In support of its application, please find the following attachments:

1. Notice of Motion
2. Declaration of Loren L. Forrest Jr.
3. Memorandum of Law In Support of Motion to Compel Arbitration

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Respectfully submitted,

HOLLAND & KNIGHT LLP

/s/ Loren L. Forrest Jr.
Loren L. Forrest Jr.

Cc: All counsel of record via e-mail